

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NORTH DAKOTA

UNITED STATES OF AMERICA

v.

JACOB BRADLEY DEMARAIS

**INDICTMENT**

Case No. \_\_\_\_\_

Violations: 18 U.S.C. §§ 2252(a)(2),  
2252(a)(4)(B), 2252(b)(1), 2252(b)(2),  
and 2253(a)

**COUNT ONE**

**Distribution of Images Depicting the Sexual Exploitation of Children**

The Grand Jury Charges:

From on or about February 10, 2021, to on or about February 14, 2021, in the  
District of North Dakota, and elsewhere,

JACOB BRADLEY DEMARAIS

knowingly distributed visual depictions using a means and facility of interstate and  
foreign commerce, to wit, the internet, which depictions had been transported in interstate  
and foreign commerce by any means, including by computer, the production of which  
visual depictions involved the use of a minor engaging in sexually explicit conduct and  
which depictions were of such conduct;

In violation of Title 18, United States Code, Sections 2252(a)(2) and 2252(b)(1).

COUNT TWO

**Possession of Images Depicting the Sexual Exploitation of Children**

The Grand Jury Further Charges:

In or about March 2021, in the District of North Dakota, and elsewhere,

JACOB BRADLEY DEMARAIS

knowingly possessed visual depictions that had been transported using a means and facility of interstate and foreign commerce, to wit, the internet, which depictions had been transported in interstate and foreign commerce by any means, including by computer, the production of which visual depictions involved the use of a minor engaging in sexually explicit conduct and which depictions were of such conduct;

In violation of Title 18, United States Code, Sections 2252(a)(4)(B) and 2252(b)(2).

FORFEITURE ALLEGATION

The Grand Jury Further Finds Probable Cause That:

Upon conviction of violating Title 18, United States Code, Section 2252, as charged in this Indictment,

JACOB BRADLEY DEMARAIS

shall forfeit to the United States any and all matter which contains visual depictions produced, transported, shipped, and received in violation thereof and any and all property used and intended to be used in any manner and part to commit and to promote the commission of such violations, including, but not limited to, the following:

- One iPhone, black in color; and
- One iPhone, silver in color, with Serial No. A1778.

By virtue of commission of one or more of the felony offenses as charged in this Indictment, all right, title, and interest in the above-described property is vested in the United States and is hereby forfeited to the United States, pursuant to Title 18, United States Code, Section 2253(a).

A TRUE BILL:

/s/ Foreperson  
Foreperson

/s/ Nicholas W. Chase  
NICHOLAS W. CHASE  
Acting United States Attorney

GLD/tmg